

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
)
)
v.) NO. 3:10-260
) JUDGE HAYNES
HAJI SALAD)

MOTION TO BRIEFLY EXTEND MOTION FILING DEADLINE
(FOR THREE (3) DAYS)

*ON DEN
This motion
is GRANTED
by Judge
HAYNES
8-22-13*

Comes now Defendant Haji Salad, through undersigned counsel, and moves the Court to briefly extend the deadline to file motions. The current deadline to file motions is today, August 22, 2013. Counsel is seeking three (3) additional days within which to file motions, with a new deadline of August 25, 2013. In support of this motion, counsel submits the following

1. Counsel's recent schedule has been very hectic. Last night, counsel submitted his appellee brief in the Sixth Circuit regarding the detention issue in this case which the Government appealed. While the issue is relatively simple, the case is, as this Court knows, voluminous. Thus, the appeal of a relatively simple issue took much longer than counsel anticipated.

2. Undersigned counsel was also scheduled for two (2) jury trials this week, one on Monday, August 19, 2013 and one on Wednesday, August 21, 2013. The case set for Monday, August 19, 2013 was a complex wiretap case in state court. One of those cases settled Friday, August 16, 2013, and the other settled Monday, August 19, 2013. Until then, counsel did not know they would settle, and counsel had to prepare for whichever trial went forward.

3. Counsel has researched the issues that need to be addressed in pretrial motions, and has started drafting motions, but counsel is afraid that his recent schedule will force him to omit an important issue or prepare a sloppy or incomplete argument for the Court. Counsel very